

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:21-cv-10986

JASMINE HUFFMAN, JUSTIN ACKERS,  
CAITLYN HALL, and BENJAMIN  
CHAMBERS-MAHER

Plaintiffs,

v.

CITY OF BOSTON, and MICHAEL BURKE,  
EDWARD JOSEPH NOLAN, and MICHAEL  
J. MCMANUS, in their individual capacities,  
Defendants.

**DEFENDANTS' PARTIAL OPPOSITION TO  
PLAINTIFFS' MOTION TO UNSEAL RECORDS**

Defendants, City of Boston, Michael Burke, Edward Joseph Nolan, and Michael J. McManus ("Defendants"), submit this partial opposition to Plaintiffs' Motion to Unseal Records.

After consideration, Defendants do not oppose Plaintiffs' motion to unseal with respect to Exhibit 8 (BRIC Emails) and Exhibit 53 (Internal Affairs Resumes).

Defendants partially oppose Plaintiffs' motion to unseal with respect to Exhibit 10 (Operations Plan). Specifically, Plaintiffs request that the latter half of the exhibit (COB 1607 – 1618) remain impounded. As grounds therefor, Defendants state that there is good cause to impound these pages, which contain detailed information about the Boston Police Department's tactical response to a large crowd event, including command and personnel assignments and staging information. Much of this

information could be used in the Boston Police Department's tactical response to future crowd events, and should be kept confidential.

In addition, unlike the first part of the exhibit, Defendants did not quote the relevant portion of Exhibit 10 in their statement of facts. Instead, in paragraph 24 of the Statement of Facts, they made general reference to the material contained therein, noting that the plan "detailed command and personnel assignments from the various police districts, the mobile operations patrol, the citywide bicycle unit, the Youth Violence Strike Force, and the Drug Control Unit," and that with respect to outside agencies, the "Massachusetts State Police would stage a [public order] platoon, and COBRA units will be acting as Mobile Field Forces with BPD Bicycle Unit."

For these reasons, Defendants respectfully request that pages COB 1607 – 1618 of Exhibit 10 remain impounded.

Dated: November 13, 2024

Respectfully submitted,

**DEFENDANTS CITY OF BOSTON,  
MICHAEL BURKE, EDWARD JOSEPH  
NOLAN, and MICHAEL MCMANUS**

Adam N. Cederbaum,  
Corporation Counsel

By their attorneys,

/s/ Randall F. Maas

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### **CERTIFICATE OF SERVICE**

I, Randall Maas, hereby certify that on November 13, 2024, a true and correct copy of this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Randall Maas

Randall Maas